

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a  
SHAREHOLDER.COM ,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, ROBERT I. ADLER, JOHN  
DOES 1 through 5 and JANE DOES 1 through 5,

Defendants.

Civil Action No. 04-10535-PBS

**MOTION TO IMPOUND SHAREHOLDER.COM'S MEMORANDUM IN  
SUPPORT OF ITS MOTION FOR LEAVE TO SHARE INFORMATION  
DESIGNATED BY DEFENDANTS AS "CONFIDENTIAL" WITH THE  
ATTORNEY GENERAL'S OFFICE**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Memorandum in Support of its Motion for Leave to Share Information Designated by Defendants as "Confidential" with the Attorney General's Office, which is being filed by hand with the Court today. The memorandum contains information the defendants have designated as "Confidential." Under the parties' Stipulated Protective Order (Docket No. 37), Shareholder.com is required to seek impoundment of any documents filed with the Court containing "Confidential" information. *See* Stipulated Protective Order at ¶ 14.

Shareholder.com reluctantly moves for impoundment of its memorandum because it does not believe that any information included in the brief warrants a "Confidential" designation. However, as Shareholder has noted in previous motions to impound, the

defendants continue to erroneously maintain that information concerning their wrongdoing is confidential. Since Shareholder.com does not want to incur the burden and expense associated with seeking de-designation of the numerous improperly designated documents, Shareholder.com moves for impoundment pursuant to the Stipulated Protective Order.

SHAREHOLDER.COM  
By its attorneys,

/s/ Melissa C. Allison

Thane Scott (BBO #449340)  
Ruth T. Dowling (BBO #645568)  
John T. Bennett (BBO #648464)  
Melissa C. Allison (BBO #657470)  
PALMER & DODGE LLP  
111 Huntington Avenue at Prudential Center  
Boston, MA 02199-7613  
617.239.0100

July 8, 2005

LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that counsel for Mr. Adler and counsel for the corporate defendants would not agree to forego this motion to impound, and therefore, Shareholder.com files this motion pursuant to the Stipulated Protective Order.

/s/ Melissa C. Allison